

CULPEPPER IP, LLLC  
Kerry S. Culpepper, Bar No. 9837  
75-170 Hualalai Road, Suite B204  
Kailua-Kona, Hawai'i 96740  
Telephone: (808) 464-4047  
Facsimile: (202) 204-5181  
E-Mail: [kculpepper@culpepperip.com](mailto:kculpepper@culpepperip.com)

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

Hunter Killer Productions, Inc. et al., ) **Case No.: 1:19-cv-00168-LEK-KJM**  
Plaintiffs, ) **(Copyright)**  
vs. )  
Qazi Muhammad Zarlish, et al. ) RULE 55(a) REQUEST FOR CLERK  
Defendants. ) TO ENTER DEFAULT AGAINST  
 ) DEFENDANTS QAZI  
 ) MUHAMMAD ZARLISH AND  
 ) NGHI PHAN NHAT;  
 ) DECLARATION OF COUNSEL;  
 ) PROPOSED ENTRIES OF  
 ) DEFAULT; CERTIFICATE OF  
 ) SERVICE  
)

REQUEST FOR CLERK TO ENTER DEFAULT AGAINST DEFENDANTS  
QAZI MUHAMMAD ZARLISH AND NGHI PHAN NHAT

TO: CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to Fed R. Civ. P. 55(a), Plaintiffs Hunter Killer Productions, Inc.,  
TBV Productions, LLC, Venice PI, LLC, Bodyguard Productions, Inc. and LHF  
Productions, Inc., (“Plaintiffs”) hereby apply for entry of default by the Clerk of the

Court against Defendants QAZI MUHAMMAD ZARLISH and NGHI PHAN NHAT.

Defendant QAZI MUHAMMAD ZARLISH executed a Waiver of Service acknowledging receipt of the Summons and Complaint in Pakistan and that his responsive pleading was due 90 days from April 4, 2019. [Doc. #12]. Accordingly, Defendant QAZI MUHAMMAD ZARLISH's responsive pleading was due on July 3, 2019. Defendant QAZI MUHAMMAD ZARLISH has failed to appear or otherwise defend.

Pursuant to the Order Granting Plaintiffs' Second *Ex Parte* Motion for Order Permitting Clerk to perform foreign mailing [Doc. #17], Defendant NGHI PHAN NHAT was served by delivering a copy of the Summons, Scheduling Order, Complaint and a Vietnamese Machine Translation thereof by FedEx on June 5, 2019. *See* Decl. of Stephanie Kessner [Doc. #20] at ¶3. Accordingly, Defendant NGHI PHAN NHAT's responsive pleading was due on June 26, 2019. Defendant NGHI PHAN NHAT has failed to appear or otherwise defend.

For these reasons, Plaintiffs request that the Clerk of the Court enter default judgment on all claims plead in the Complaint with regards to Defendants QAZI MUHAMMAD ZARLISH and NGHI PHAN NHAT. Plaintiffs will separately file a request under Rule 55(b) for the court to (1) effectuate judgment; (2) determine the amount of damages; (3) establish the truth of any allegation by evidence; or (4)

investigate any other matter.

DATED: Kailua-Kona, Hawaii, July 8, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper  
Kerry S. Culpepper

Attorney for Plaintiffs